

LEGISLATIVE AUDIT DIVISION

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MEMORANDUM

TO: Legislative Audit Committee Members
FROM: Angie Grove, Deputy Legislative Auditor, Performance Audits
DATE: November 2007
CC: Mary Sexton, Director, Department of Natural Resources and
Conservation (DNRC)
Bob Harrington, Administrator, DNRC Forestry Division
RE: Performance Audit Follow-up (05SP-21): Wildland Fire Administration (04P-11)

INTRODUCTION

During the summer of 2003 DNRC had a fire season with larger, more intense wildland fires, resulting in higher fire costs, than the department had experienced in any previous fire season. At the conclusion of the 2003 fire season, legislators requested a performance audit of the state's overall wildfire preparedness and suppression program. Some areas requested for audit included:

- The sufficiency of DNRC's initial attack resources.
- Major cost drivers for fire management and suppression.
- The impact of the wildland-urban interface on fire suppression costs.
- The level of coordination between state, federal, and local resources.
- The extent pre-established costs or contracts are used for fire suppression resources.
- An evaluation of the effectiveness of Montana's overall fire suppression policy.

In December 2004 the Legislative Audit Division (LAD) issued its performance audit report of Wildland Fire Administration. The report contained 27 recommendations suggesting ways to improve wildland fire administration. Twenty-six recommendations were to DNRC and one to the Legislature.

Since wildfire suppression is often a cross-jurisdictional issue, DNRC had to coordinate changes resulting from several of the audit recommendations with its federal and local partners. As a result, many of the audit recommendations needed multiple fire seasons to be put into practice. LAD monitored DNRC's process in implementing the recommendations over the last three fire seasons. This work included interviewing DNRC officials, reviewing fire suppression documentation, attending Line Officer and Incident Business Advisor training courses, observing a meeting of the best value contract inspection team, and observing occasional fire suppression activities. We also obtained written communications from DNRC on two different occasions outlining their progress in implementing the recommendations.

The first communication (April 2006) showed DNRC was making progress in implementing the recommendations. The second (October 2007) indicated the majority of recommendations were implemented or being implemented. Based on the follow-up work conducted, it appears DNRC is working to implement the audit recommendations. The attached document discusses progress made on each audit recommendation in more detail.

Overview

The original audit report contained 27 recommendations to improve how DNRC administers wildland fires. Twenty-six recommendations were to DNRC and one was to the Legislature. Follow-up work found DNRC has either implemented or is implementing all 26 recommendations. The Legislature implemented its recommendation during the 2005 and 2007 Legislative sessions. According to DNRC officials, some audit recommendations have resulted in significant cost savings to the state. For example, DNRC estimates improvements to its aviation program have saved the State of Montana between \$15 - \$20 million dollars since 2006.

BACKGROUND

The types of wildland fires are based on size and complexity. For basic administration of fires, however, there are really only two kinds: initial attack fires and extended attack fires (i.e. project fires). The distinction between them is the length of time to extinguish. Initial attack fires are typically contained or controlled within 1-2 operational periods, with 24 hours being a typical operational period. Project fires are incidents that could not be contained or controlled by initial attack forces and need more firefighting resources. Project fires can range from two days to several months depending upon location, topography, and forest fuels.

Montana's fire protection agencies (state, federal, and local) are initial attack-oriented firefighting forces. Their primary objective is to aggressively respond to reports of fire in an attempt to keep the fires as small as possible. These agencies often rely upon one another to assist and support their initial attack efforts. The administration of initial attack fires is typically conducted by the fire protection agency responsible for protecting that land. An incident commander working for that entity orders the necessary fire suppression resources and determines how those resources (personnel and equipment) are used to suppress the fire.

If a fire becomes a project fire, a substantively different administrative approach generally comes into play. Because these fires are already large and/or complex or rapidly getting to that point, it becomes necessary to bring in "Incident Management Teams (IMTs)" to manage and ultimately suppress the fires. Instead of each agency having its own IMT, a coalition of agency resources was developed.

FOLLOW-UP AUDIT FINDINGS

Our 2004 performance audit report contained 27 recommendations in five major areas related to wildland fire administration. These areas included:

- ✓ Initial attack of wildland fires
- ✓ Cost controls over wildland project fires
- ✓ Post fire activities
- ✓ Aviation resources used in wildland fire suppression
- ✓ Other miscellaneous fire issues (Montana's fire policy, local fire resources, Incident Management Teams, etc.)

The following sections provide a general discussion of the implementation status of recommendations made in each of these areas. Detailed information regarding implementation status and how DNRC implemented each recommendation can be found on the attached document.

Initial Attack of Wildland Fires

Audit work noted the most effective way to control fire costs is to keep fires small through aggressive initial attack. Report recommendations one through four related to improving DNRC's initial attack operations. These included:

- 1. Coordinate with the NRCG to implement a two-tiered rate system for funding severity resources.*
- 2. Make completion of the fire program analysis a priority.*
- 3. Seek support for additional funding from the legislature for the county cooperative program.*
- 4. Seek legislation to establish a formal risk financing method for severity funding.*

DNRC implemented three of the recommendations and one recommendation is being implemented. Accomplishments include reducing severity rates to either 50 percent or 75 percent depending on whether a resource is a best value contract or local government resource. DNRC also obtained funding from the 2005 Legislature to strengthen its State-County Cooperative program. DNRC officials indicated this has resulted in more resources being allocated to counties and enhancing their ability to initial attack wildland fires in their protection areas.

Cost Controls Over Wildland Project Fires

When fires escape initial attack efforts, initial attack resources are typically pulled off the fire and returned to their initial attack responsibilities. At this time, an interagency incident command structure generally assumes suppression efforts under the direction of an administering entity (DNRC, U.S Forest Service, etc.). Suppression efforts are generally managed by an IMT. By agreement and necessity, local, state, and federal personnel have been recruited and trained over the years to participate on IMTs. Recommendations five through thirteen suggested changes over fire business controls to better manage project fire costs for fires administered by IMTs. These recommendations are listed below.

- 5. Standardize first and last day of work payments to local fire departments.*
- 6. Take steps to ensure on-site equipment inspections are performed on project fires.*
- 7. Change language in equipment contracts to reflect damage claim clauses used in national engine/aviation contracts.*
- 8. Work with federal and other partners to improve and expand Delegation of Authority language to provide more specific direction to Incident Management Teams.*
- 9. Strengthen the cost share agreement development process by increasing training and support for Line Officers.*
- 10. Aggressively implement use of Incident Business Advisors.*
- 11. Use close-out briefings for a more detailed discussion of a fire's administration.*
- 12. Ensure Line Officers conduct detailed performance appraisals of Incident Management Teams and incorporate the information into the overall evaluation of the IMT.*
- 13. Work to establish meaningful performance measures for all personnel assigned to fire incidents, including contractors. Incorporate requirements for performance appraisals into each fire's Delegation of Authority.*

All but one of the above recommendations (recommendation #12) is implemented. Recommendation #12 is in the process of being implemented. According to DNRC officials, implementation of many of these recommendations required significant coordination with its federal and local partners. Some highlights include more emphasis and training on using delegation of authority (DOA) documents, making DOA language more specific to individual fires to clarify expectations of IMTs, providing additional training to DNRC line officers, and using Incident Business Advisors (IBA) more frequently and providing these individuals additional training. According to DNRC officials, department staffing limitations continue to make IBA use a challenge. DNRC is still working to fully enhance its performance appraisal process of IMTs, such as getting modifications to performance appraisal forms finalized. Once this process is fully operational (i.e. approved by the Northern Rockies Coordinating Group and consistently used on fires), it should be an effective tool in conducting more detailed and useful evaluations of how IMTs managed suppression activities and identify improvements or modifications for future suppression tactics.

Post Fire Activities

Once a fire is over and fire season winds down, there are many post fire activities that take place related to project fires. These activities include reviewing suppression tactics, coordination issues, cost recovery efforts, contracting issues, and payment for fire cache items used during fires. Recommendations 14 through 21 addressed ways to improve post fire activities. These were:

- 14. Clarify policy on when DNRC will pay individuals and industry for assistance efforts on accidentally started fires.***
- 15. Establish tighter controls over fire cache.***
- 16. Continue efforts to solicit competitive proposals for wildland firefighting contracts.***
- 17. Actively examine cost benefits of renting versus purchasing items for suppression, and reexamine fire cache contents.***
- 18. Begin cross-training other department staff for FEMA cost recovery efforts and review of federal fire bills.***
- 19. Employ formal retrospective cost studies to examine efficiency and effectiveness of wildland fire suppression efforts and provide results to fire managers.***
- 20. Strengthen capabilities of Line Officers by providing training and additional resources for large project fires and when requested on other fires.***
- 21. In cooperation with other fire protection agencies explore options to involve dispatch in discussing, evaluating, and documenting the role of dispatch in a fire's administration.***

DNRC is making progress on all of these recommendations and implementation is ongoing. Five recommendations (recommendations 14, 15, 16, 18, and 20) are fully implemented and three (recommendations 17, 19, and 21) are being implemented. Again, many of these recommendations required a great deal of coordination with federal and local partners in order to get them implemented. Recommendations DNRC has implemented include clarifying payments to contractors for accidentally started fires, improving fire cache controls, establishing a competitive bidding process for fire resources (i.e. best value contracting), cross training DNRC staff for cost recovery, and strengthening line officer capabilities. As part of examining renting versus purchasing items for fire suppression, DNRC is reviewing policy related to this issue and is trying to determine how to best proceed on matter. The department is also examining ways to better incorporate cost containment principles into post fire reviews (such as placing more emphasis on wildfire prevention, initial attack preparedness, etc), and is continuing to work to involve dispatch centers in the post season discussion on wildfire suppression activities.

Aviation Resources Used in Wildland Fire Suppression

DNRC is initial attack oriented and aviation resources, particularly helicopters, play a significant role. Helicopters can quickly deliver both water and ground crews to fires. A total of three recommendations (recommendations 22 – 24) were made to enhance DNRC's aviation and initial attack capabilities.

- 22. Request appropriations for sufficient personal services to provide for a continuous helitack capability for each helicopter assigned to land offices during the fire season.***
- 23. Request sufficient personal services resources to safely and effectively operate all assigned aircraft and more accurately reflect actual pilot operating requirements.***
- 24. Request sufficient personal services resources to properly staff its aviation maintenance program.***

All three recommendations have been implemented. The 2005 Legislature approved DNRC's request for additional personal services funding for helitack crews, more pilots so all helicopters could be flown, and additional mechanics to maintain DNRC aircraft. Over the last three fire seasons, DNRC has been able to operate helitack crews out of Kalispell, Missoula, and Helena. The additional funding has also helped DNRC increase helicopter pilot availability. In addition, DNRC has hired three full-time aviation mechanics (for a total of five) to work on DNRC's helicopters and fixed-wing aircraft. DNRC estimates these additional resources have saved the State of Montana at least \$15 to \$20 million in fire suppression costs due to quicker and more efficient initial attack of fires.

Other Miscellaneous Fire Issues

Our 2004 performance audit identified several other fires suppression issues that do not necessarily fit into initial attack, project fire operations, or post fire activities. However, these other issues were no less important to improve wildfire suppression activities and help control fire costs. Recommendations 25 through 27 related to miscellaneous wildland fire suppression issues that DNRC needed to address to help improve suppression activities. These issues related to local government fire organizations, forming additional Type 3 IMTs, and updating Montana's fire-related statutes. These three recommendations are outlined below.

- 25. Develop and update fire-related statutes to address current development and environmental conditions and improve wildland fire suppression management and mitigation.***
- 26. Establish formal agreements with local fire organizations to clarify responsibilities and compensation for responding to DNRC fires occurring outside the statutory fire season.***
- 27. Present a proposal for the formation, maintenance, and funding of additional Type 3 Incident Management Teams.***

All three of the recommendations are implemented. In response to recommendation 25, the 2005 legislature passed HJR 10 requiring an interim study of fire-related statutes. The HJR 10 interim study reviewed three main areas – assessment of state fire policy; statute review for outdated, inconsistent, or unclear laws; and, impacts of the wildland urban interface on fire suppression. The HJR 10 study resulted in passage of several fire-related bills during the 2007 Legislative Session. DNRC has also incorporated a mutual aid concept into operating agreements with local governments and is negotiating payment agreements with local fire departments for times when DNRC is unable to respond to fires. DNRC officials indicated these agreements have been difficult to achieve but believe it has helped improve relationships with local governments. DNRC submitted a proposal to the 2005 Legislature to fund additional Type 3 IMTs to handle larger, but less complex fires. However, the funding was not approved.

**Montana DNRC Fire Program
2004 Wildfire Performance Audit Follow-up – Recommendation Status
October 2007**

Recommendation	Specific Recommendation	Status	Comments
1. Two-Tiered Rate for Severity	DNRC with NRCG establish a two-tiered rate system for hiring severity resources.	Implemented: DNRC has a 75% ‘severity rate’ within the state appendix on the Best Value Contract. Additionally, a 50% reduced rate for severity has been negotiated for use of local government resources.	Success was mixed with implementation of this recommendation during the 2005-2007 wildfire seasons, as some contractors were not available if hired on severity at a reduced rate. Resources were available during the early and late season periods, but seldom during the height of the fire season.
2. Fire Program Analysis (FPA)	Complete the Fire Program Analysis and report to 2007 Legislature.	Being Implemented: The initial FPA process has proven to be unreliable, so a different fire model (CFES) was used to analyze portions of the DNRC Fire Program. The FPA effort has been modified using features of the CFES model and DNRC remains actively involved in the development of a prototype project in Northwest Montana.	DNRC will evaluate the utility of the new FPA model and determine if the complete DNRC Fire Program should be analyzed.
3. County Coop program support	DNRC seek additional funding for the County Coop portion of the program.	Implemented: Completed during the 2005 Legislature. Westside County Coop program restored and additional support to entire program. Four new FTE and \$602k+ in new funding allocated.	Four positions hired (1 ea. @ ELO, CLO, NWLO, & EDC) and 30 new T6 engines developed for delivery to counties to date. Annual work plan includes 15 new county engines to be developed and delivered to priority counties.
4. Risk Financing Fund	DNRC see legislation to establish a formal risk financing method to be used for severity funding, increasing effectiveness of IA, and reducing the risk of wildfires.	Implemented: Proposal submitted to 2005 Legislature but not approved.	DNRC does not intend to reintroduce this type of proposal. Procurement of severity resources will continue to be based upon wildfire risk and activity, and charged to the fire suppression account created by the 2007 special legislative session. Fuel reduction projects on private lands will continue to be financed primarily by federal funds. DNRC will continue to utilize severity resources for fuel reduction and other project accomplishments if fire conditions allow.

Recommendation	Specific Recommendation	Status	Comments
5. Standardized payment to local fire departments	<p>A. Develop and distribute one contract template.</p> <p>B. Clarify language in NWCG Business Handbook</p> <p>C. Provide clear direction to DNRC staff.</p>	Implemented: A, B & C were completed via DNRC Fire Business Committee and ongoing line officer meetings, advisory committee meetings, and NRCG/DNRC business committee meetings. Additional training and updates for DNRC and local government staff is ongoing.	Implementation of the <i>Incident Rental Agreement</i> has helped to separate and standardize hiring of local government resources.
6. Equipment Inspections on project fires.	<p>A. Including language in the Delegation of Authority specifying on-site inspections of equipment will be conducted and documented.</p> <p>B. Working with NRCG to address the issue of adequate resources to conduct equipment inspections on fire managed by IMTs.</p>	<p>Implemented:</p> <p>A. Delegation of Authority language was presented at DNRC Line Officer training in spring of 2005 with model language provided.</p> <p>B. Two equipment inspection workshops were held in 2005 to train NRCG agency employees for conducting equipment inspections. Additionally another interagency workshop was held in spring 2006 with three DNRC employees attending.</p>	Equipment Manager positions on IMTs remain difficult to fill, which inhibits the ability to adequately implement this recommendation. Contractor inspections used in 2007 for preseason inspections on Best Value equipment. Expanding use of contract inspectors to IMTs and specific incidents may also improve inspections and reduce costs.
7. Damage Claim Process Changed	<p>A. Change the language in future equipment contract to reflect damage clauses used on national engine and aviation contracts.</p> <p>B. Provide all DNRC staff responsible for settling contract damage claims direction through revised department policy and training.</p>	<p>Implemented:</p> <p>A. Contract language has been changed to implement this recommendation.</p> <p>B. DNRC staff now has new direction related to processing fire claims in the 300 Manual. IBA training has been conducted annual since 2004 to teach employees these changes.</p>	Incident Business Management training remains an ongoing workload with process changes and new employees.

Recommendation	Specific Recommendation	Status	Comments
8. Delegation of Authority	<p>A. Work with federal and other partners to improve and expand the Delegation of Authority language.</p> <p>B. Include more specific direction in the Fire & Aviation Management 900 Policy Manual on the development of Delegations of Authority.</p> <p>C. Change the Delegation of Authority format to provide more specific guidance on cost containment expectations.</p>	<p>Implemented:</p> <p>A. Work completed on updating the training for DNRC Line Officers regarding their use of Delegations of Authority. Line Officer training in 2004 -2007 included these changes.</p> <p>B. The 900 Manual has been edited to provide more specific direction for DNRC Line Officers regarding development of Delegations of Authority and use of Incident Business Advisors.</p> <p>C. The Delegation of Authority format has not been significantly changed, but does allow for specific cost containment expectations to be included.</p>	<p>Significant progress has been made in standardizing the DOA format while allowing for tailoring the document to fit circumstances related to each incident. This has helped clarify expectations for IMTs during the in briefing, and throughout management of the incident.</p>
9. Cost Share Agreements	<p>A. Providing additional training and mentoring opportunities to Line Officers.</p> <p>B. Assigning a specialist to assist Land Officers with cost share negotiations on the more complex project fires.</p>	<p>Implemented:</p> <p>A. DNRC has provided additional Line Officer training and utilized mentoring opportunities in 2004- 2007.</p> <p>B. DNRC has increased consultation between FAMB staff, Incident Business Advisors, and Area Offices during cost share agreement negotiations to ensure state interests are protected.</p>	<p>A cost share template was completed in 2007 in cooperation with NRCG agencies as a model of options to utilize when negotiating cost share agreements. DNRC initiated a small 'cost share team' in 2007 to assist line officers with completing complex cost share agreements. Additional cost share training within NRCG agencies has been proposed for the spring of 2008.</p>
10. Incident Business Advisor (IBA) Development and Use	<p>A. Develop a program to provide training and mentoring for IBAs.</p> <p>B. Ensure Delegation of Authority contains direction on use of IBAs.</p> <p>C. Aggressively implement the use of IBAs on T3 or larger fires.</p>	<p>Implemented:</p> <p>A. IBA training sessions have been developed and delivered to specific DNRC employees in 2004, 2005, and 2006. IBA task books and guidelines, as well as an IBA performance checklist have also been developed and are utilized by DNRC.</p> <p>B. Guidance to Line Officers --- and communication during fire season --- clearly directs Line Officers to include direction of IBA use within their Delegation of Authority.</p> <p>C. There have been several Type 3 or larger incidents since the recommendation was accepted and on each occasion DNRC assigned an IBA to assist in cost control.</p>	<p>Staffing all the IBA positions needed in active fire seasons remains a large challenge. Outreach to individuals outside the fire program will remain a focus to meet this need. Success to date has been getting the IBA program established on State fires and the next program focus will be targeting specific cost areas and implementing policies consistently.</p>

Recommendation	Specific Recommendation	Status	Comments
11. More Effective Incident Close-outs	DNRC take better advantage of opportunities presented during close out briefings by encouraging a more detailed level of discussion.	Implemented: More effective close-out briefings, including better briefing guidance and outlines, were a focus of the 2005 DNRC Line Officer training session. Discussions at the 2006 and 2007 also centered on the importance of open and honest closeouts to capture lessons learned from the IMT.	NRCG is considering a change to the closeout format to focus on lessons learned and reducing the number of IMT members that participate.
12. Improved IMT Performance Appraisals	<p>A. Ensure line officers conduct detailed performance appraisals of IMTs, placing special emphasis on meeting cost containment goals.</p> <p>B. Submit modifications of the existing IMT appraisal form to NRCG to provide more detailed feedback of IMTs.</p> <p>C. Submit copies of IMT appraisals to NRCG and DNRC officials as part of an overall evaluation of the role of IMTs.</p>	<p>Being Implemented:</p> <p>A. IMT performance appraisals were addressed during the 2005 DNRC Line Officers meeting.</p> <p>B. Proposed modifications to the NRCG IMT appraisal form have not yet been submitted.</p> <p>C. All IMT appraisals are to be submitted to both the Agency Administrators and the NRCG Coordinator for each IMT assignment. IMT development, use, and related challenges continue to be the subject of an Agency Administrator panel discussion at the annual IMT spring meeting.</p>	Additional work is needed to modify the IMT appraisal form.

Recommendation	Specific Recommendation	Status	Comments
13. Improved Performance Appraisals of all Fire Personnel	<p>A. Establish formal, comprehensive, and meaningful performance measures for all personnel assigned to fire incidents.</p> <p>B. Adopt the recommendations of its NRCG Business Management Committee regarding performance appraisals for contracted resources.</p> <p>C. Incorporate requirements for performance appraisals to be conducted by IMT personnel of all contracted, as well as state/federal resources into each fire's delegation of authority.</p> <p>D. Compile and analyze the performance appraisal results as part of the personnel resource ordering/selection process.</p>	<p>Implemented:</p> <p>A. Performance appraisal form for all wildfire personnel has been developed.</p> <p>B. Performance appraisals will be incorporated into Best Value Contract awards beginning spring 2007. All agency personnel are required to receive performance appraisals through NRCG and agency administrator direction.</p> <p>C. Incorporated into Delegation of Authority for all teams on DNRC wildfires.</p> <p>D. Performance appraisals utilized during IMT member selection process; application to resource ordering, sign-up, and selection in other facets is ongoing with Best Value Contracting and other agency processes.</p>	DNRC will continue to monitor and ensure past performance is considered during selection and ordering process whenever possible.
14. Payment to Contractors for Suppression on Accidental Wildfires	Clarify DNRC's policy outlining conditions on when it will and will not pay individuals and industry for assisting in suppression efforts on accidentally started wildfires.	<p>Implemented:</p> <p>Policy has been reviewed, and issue has been clarified and addressed during 2005 Line Officer training. Contractors will be paid for suppression efforts only when specifically ordered, and meeting qualifications for fireline duties.</p>	None
15. Improve Controls Over Cache Items	<p>A. Include more specific language in each fire's Delegation of Authority requiring IMT's to establish tighter controls over fire cache items.</p> <p>B. Require DNRC line officers to ensure fire cache controls on fires are being followed.</p> <p>C. Modify department policy regarding acceptable fire cache losses so it is more in line with NRCG policy.</p>	<p>Implemented:</p> <p>A. Incorporated into revised Delegation of Authority, and focus of closeout meetings with IMTs during 2005 wildfire season.</p> <p>B. Fire cache controls and loss rates are a component of DNRC line officers performance appraisals.</p> <p>C. Department guidelines have been modified to better align with NRCG policy. This will be an ongoing focus of training for DNRC Line Officers.</p>	Loss rate in 2007 was 4% for durable items. DNRC policy established an acceptable durable loss ratio of 6%.

Recommendation	Specific Recommendation	Status	Comments
16. Competitive Bidding for Wildfire Contracting	DNRC should continue efforts to solicit competitive proposals.	Implemented: Competitive bidding for lunches, portable toilets, ice, hand wash stations, and rental cars has been implemented within DNRC. All NRCG members, including DNRC, have implemented Best Value Contracting for water handling equipment for 2006 wildfire season.	Additional bidding processes for 2008 for NRCG agencies include: Type 3 Caterers, Faller Modules, GIS Units, Tents/Yurts, Helicopter Support Trailers, Communication Trailers, Crash Rescue Trucks, Gray Water Trucks, and Service/Shop Trucks. Heavy Equipment is slated for a 2009 bid date.
17. Use of Rented vs. Purchased Equipment	A. Actively examine cost benefits of renting versus purchasing items for wildfire suppression. B. Along with NRCG partners, reexamine fire cache contents to determine whether changes should occur as a result of 2003 fire season experiences.	Being Implemented: A. No comprehensive analysis (or report) has been produced to date, but issue is pending before DNRC Fire Business Committee. B. NRCG Cache managers continue to review the equipment contained in the cache, and determine efficacy of purchasing items currently rented.	DNRC analysis will likely lead to a proposed change in DNRC policy for these types of purchases. Some fire equipment in the 2007 fire season was leased with the option to purchase.
18. Cross Training for Cost Recovery and Auditing Fire Invoices	DNRC immediately begin cross-training other staff for FEMA cost recovery efforts and review of federal fire bills.	Implemented: New DRNC fire business specialist was hired fall 2005, and is involved with Best Value Contracting and cost recovery processes.	Long-term continuation of cost recovery processes with FEMA and auditing of fire billing is essential to minimizing net costs to state of Montana from wildfires. Additional staffing has been needed to meet timelines for bill submittal to other agencies as well as providing accurate costs for the legislature and budget office.
19. Retrospective Cost Studies of Wildfires	DNRC employ formal retrospective cost studies in order to examine efficiency and effectiveness of wildland fire suppression efforts and provide results to fire managers.	Being Implemented: “After action” and post season fire reviews are conducted following each wildfire incident. Incorporating cost containment principles into this process is not complete, however, and will continue to be a focus for line officers and fire and aviation staff.	Both types of fire reviews continue to reinforce the importance of wildfire prevention, and adequate preparedness for DNRC and local government wildfire resources as one of the most effective method of cost containment of wildfires.

Recommendation	Specific Recommendation	Status	Comments
20. Strengthen Capabilities of Line Officers	<p>A. Sending line officers to regional and national training when feasible.</p> <p>B. Encouraging the use of training assignments to gain additional practical experience.</p> <p>C. Requiring the line officer to order an IBA on all Type 3 or larger fires.</p> <p>D. Assigning an experienced person to assist the line office on Type I fires and when requested for other fires.</p>	<p>Implemented:</p> <p>A. DNRC line officers generally attend regional or national training corresponding to their positions on Incident Management Teams. Other training for line officers is typically within the state and most notably the annual spring line officer meeting.</p> <p>B. Training or off-area assignments have been used by several DNRC line officers (or trainees) within the past few years.</p> <p>C. Use of an IBA on all Type 3 or larger fires is now an expectation understood by all line officers. However, there may be circumstances where an IBA is not used on Type 3 wildfires, depending on duration.</p> <p>D. Line officer representatives will continue to be ordered and used for all Type 1 or area command situations, and as needed to maintain adequate span of control for the primary line officer.</p>	<p>In 2005, DNRC line officers on incident management teams have assisted with management of hurricane recovery from both Katrina and Rita incidents. Several line officers (or those who are available to function as line officer representatives) have also been assisting the states of Oklahoma and Texas in managing their unprecedented wildfires in February/March 2006.</p>
21. Increase Involvement of Dispatch Centers in Wildfire Administration	<p>DNRC in cooperation with other fire protection agencies, explore options to more consistently involve dispatch in discussing, evaluating, and documenting the role of dispatch in a fire's administration.</p>	<p>Being Implemented:</p> <p>NRCG dispatchers routinely attend NRCG board meetings. An individual dispatch review has been completed at the Missoula Dispatch center, and a series of meetings with dispatch centers around the state discussing roles and responsibilities is ongoing. Dispatch center managers attended most DNRC post-season reviews of the 2006 season, and are expected to attend forthcoming 2007 reviews as well. Meetings are also scheduled to discuss contracting issues with all dispatch center managers in the geographic area.</p>	<p>More work is needed to reinforce the importance of dispatch centers in wildfire protection in Montana, and to engage third and second level dispatch center managers in wildfire planning and coordination meetings. Adequate levels of DNRC support in the interagency dispatch centers are a growing concern by interagency partners. DNRC received additional funding (\$80k) for interagency dispatch support from the 2007 Legislature but increased professional level dispatch staff is also an ongoing need.</p>
22. Increase Helitack Capability	<p>DNRC request appropriations for sufficient personal services to provide for a continuous helitack capability for each helicopter assigned to land offices during the fire season.</p>	<p>Implemented:</p> <p>All helitack crews (one foreman and three crew members) were operational at DNRC initial attack stations in Kalispell, Missoula, and Helena during the summer of 2005, 2006, and 2007.</p>	<p>Additional helitack capacity not only improved the effectiveness of air operations last season, but also improved the coordination and safety focus due to creation of full-time aviation managers at NWLO, SWLO, and CLO. However, additional staffing is still needed to provide manager, crew, and fuel support for two of the DNRC helicopters.</p>

Recommendation	Specific Recommendation	Status	Comments
23. Increase Aviation Pilot Personnel	DNRC request sufficient personal services resources to safely and effectively operate all assigned aircraft and more accurately reflect actual pilot operating requirements.	Implemented: Three additional seasonal pilots have been hired, making a total of two full-time and five seasonal pilots for the helicopter portion of the aviation program.	<p>Additional pilots allowed DNRC to field 7-day coverage with all aircraft during most of the 2005 and 2006 fire seasons, with assistance from short-term hiring of two “on-call” pilots. During the 2007 wildfire season, the “on-call” pilots were not available to fly DNRC aircraft, resulting in some days with less than 100% coverage from all DNRC aircraft.</p> <p>DNRC helicopters were instrumental in success of suppression efforts on numerous fires around the state since the hiring of the three additional pilots, but two more would be required to ensure 7-day coverage with all aircraft for the entire core fire season.</p> <p>Cost Savings: Conservative estimate is likely over \$15-20 million due to better coverage of DNRC aircraft.</p>
24. Increase Aviation Mechanic Personnel	DNRC request sufficient personal services to properly staff its aviation maintenance program.	Implemented: Three full-time aviation mechanics have been hired, increasing the total to five full-time mechanics for maintaining 7 helicopters and 3 fixed-wing aircraft.	Additional mechanic support has enabled construction and use of a new tail-boom jig for improving performance of UH-1 helicopters, construction of paint booth for savings of \$20,000 per aircraft, continued development of fifth UH-1 helicopter (88M), and overall ability to have rested and adequate mechanical support for the aviation assets.
25. Legislative Study of Wildfire Statutes and Wildfire Policy	Legislature authorize a study to develop and update fire-related statutes to address current development and environmental conditions and improve wildland fire suppression management and mitigation.	Implemented: HJR10 was referred to the EQC, and a workgroup convened by the EQC has met since summer 2005 to revise statutes, develop state wildfire policy, clarify roles and responsibilities, and consider development standards for the wildland-urban interface. Proposed legislation was introduced to the 2007 Legislature with several bills becoming law.	HB 112, SB 103, SB 130, SB 145, SB 147, SB 51, & SB 404 all became law. Rule making for several of the laws will be undertaken winter of 2008 by DNRC.

Recommendation	Specific Recommendation	Status	Comments
26. Clarify Wildfire Responsibilities with Local Government	DNRC establish formal agreements with local fire service organizations to clarify responsibilities and compensation for responding to DNRC fires occurring outside the statutorily designated fire season.	<p>Implemented: DNRC has initiated two processes to address this recommendation:</p> <ul style="list-style-type: none"> ○ Incorporate mutual aid concept into operating agreements that authorize use of DNRC equipment without a formal county assistance request during the initial attack period. Payment to local government within their jurisdiction would commence at the end of the IA period, if requested by DNRC. ○ Payment agreements are being negotiated with local government fire departments to authorize payment for initial attack on DNRC protection when DNRC resources are unable or inadequate to respond. 	<p>Efforts to ensure consistency with such agreements have been difficult to achieve, but both efforts will have a tremendous effect on relationships with local government, improve initial attack effectiveness, and reinforce capacity of local government fire departments.</p>
27. Create Type 3 Incident Management Teams	DNRC present to the NRCG and Legislature a proposal for the formation, maintenance, and funding of additional Type 3 Incident Management Teams for Montana.	<p>Implemented: DNRC introduced this decision package during the 2005 legislature joint budget subcommittee, but it was not approved by the full House Appropriations Committee.</p>	<p>DNRC is not planning to reintroduce a legislative proposal for this recommendation. There are concerns over the ability of wildland fire resources, and the training organization, to support additional type 3 teams sponsored by DNRC, given the difficulties in maintaining the Type 1 and 2 IMT rosters.</p> <p>The Type 3 County Assistance Team continues to be sponsored by DNRC, but is limited in scope and duration due to its roster of volunteer members. Type 3 interagency IMT pools are under development within the Bozeman, Billings, and western Montana areas, but are struggling to maintain an adequate pool of qualified personnel to draw from.</p>